

DEPARTMENT OF CONSERVATION

## DIVISION OF OIL AND GAS

1416 - 9th STREET, ROOM ~~1314~~ 1310

SACRAMENTO, CALIFORNIA 95814

(916) 445-9686



NOTICE TO OPERATORS  
REGARDING  
UNDERGROUND INJECTION CONTROL PROGRAM  
(Enhanced Recovery and Disposal Projects)

Under the provisions of Section 1425 of the federal Safe Drinking Water Act, the Environmental Protection Agency (EPA) has approved the Division of Oil and Gas' (CDOG) application to regulate injection wells that are used in relation to oil- and gas-producing operations (Class II wells). By this approval, the EPA has granted authority beginning March 14, 1983 to the CDOG to administer an Underground Injection Control (UIC) program for the purpose of preventing any injection that endangers an underground source of drinking water (USDW).

Although the injection control program that the CDOG has administered in the past will still apply in most respects, there are changes that operators should be particularly aware of when making application for new projects or modifying existing projects. Under the new program, the CDOG is responsible for the issuance of project and injection well permits, monitoring injection performance, and enforcing any actions that may be necessary to ensure that drinking water sources are protected. Implementation of this new UIC program will require that the CDOG consult with the Regional Water Quality Control Boards regarding permit requirements for each project and with the EPA regarding project compliance and enforcement.

Further, injection can only occur into hydrocarbon-bearing zones or into aquifers, or portions thereof, that contain a total dissolved solids (TDS) content that exceeds 10,000 parts per million. To inject into aquifers of less than 10,000 ppm requires a special exemption from the EPA. Also, as a general rule, more time will be required for an operator to obtain a project permit than in the past, because provisions of the UIC program require that the CDOG provide for public review and comment. There may also be the need to schedule public hearings if substantive concerns are expressed during the public comment period.

When the EPA approved the State program, the approval also included exemptions for most of the nonhydrocarbon-producing aquifers that are currently being used for waste disposal purposes. However, there are still a few aquifers that have not been exempted because pertinent data to support an exemption are either not available or the aquifer does not qualify for continued injection. Operators that are injecting into aquifers that have not been exempted will be notified.

For any additional information related to the implementation of this program or aquifer exemptions, please contact any of the CDOG offices.

*Simon Cordova*

Simon Cordova

Acting Chief

Division of Oil and Gas

2/28/83

March 9, 1983

Mr. B. R. Lavelle  
Deputy Minerals Manager  
Oil and Gas  
Bureau of Land Management  
345 Middlefield Road, MS 94  
Menlo Park, California 94025

Dear Mr. Lavelle:

Enclosed is a notice we sent to all California oil and gas operators, announcing our UIC primacy for Class II injection wells, which will become effective on March 14, 1983.

As we pointed out in a meeting with you several months ago, the Federal statute (Section 1421 of the Safe Drinking Water Act) gives the State regulatory authority over Class II injection wells on Federal as well as State and private lands in California.

To avoid any unnecessary duplication of regulatory effort, we would like to meet with you to discuss this program at your earliest convenience.

Sincerely,



Simon Cordova  
Acting Chief  
Division of Oil and Gas

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Enclosure

cc: M. G. Mefferd